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BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Jurisdictional Separations Reform and the Jurisdictional Separations Freeze, CC
Docket No. 80-286; Universal Service, CC Docket No. 96-45

Notice of *Ex Parte* presentation

On February 27, 2006 Joe Douglas and Colin Sandy of the National Exchange Carrier Association (NECA); Daniel Mitchell of the National Telecommunications Cooperative Association (NTCA); and Stuart Polikoff of the Organization for the Protection and Advancement of Small Telecommunications Companies (OPASTCO) met with Dana Brown Shaffer of Commissioner Tate's office to discuss the need to extend the current separations freeze, scheduled to expire in June of this year. NECA, Eastern Rural Telephone Association (ERTA), the Independent Telephone & Telecommunications Alliance (ITTA), NTCA and Western Telecommunications Alliance (WTA) (collectively, the "Associations") join in this written *ex parte* presentation.

The Associations¹ strongly support extension of the freeze as necessary to avoid imposing substantial administrative burdens on incumbent local exchange carriers (ILECs)² and to allow the Commission time to complete ongoing intercarrier compensation and universal service proceedings. Extension of the freeze on an interim basis will preserve the *status quo* and give the Commission time to consider carefully how changes in regulatory requirements (as well as evolving marketplace dynamics) actually affect the Commission's Part 36 separations rules.

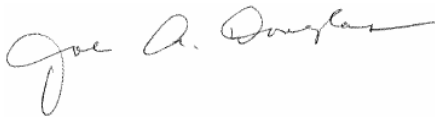
¹ Including, for purposes of this written *ex parte* presentation, the Eastern Rural Telephone Association (ERTA), the Western Telecommunications Alliance, and the Independent Telephone and Telecommunications Alliance (ITTA), whose respective memberships concur with the positions taken in this letter.

² These burdens have been documented in recent *ex parte* filings before the Commission, most notably in a USTelecom White Paper entitled "Paving the Way for Jurisdictional Separations Reform". See Letter from Robin E. Tuttle, USTelecom, to Marlene H. Dortch, FCC (Dec. 21, 2005), Attachment (*USTelecom White Paper*).

Consistent with the above, the Associations request the Commission act without delay to extend the freeze on an interim basis, pending resolution of ongoing regulatory proceedings and, as necessary, institution of additional proceedings to consider specifically how the separations rules should be conformed to revised Intercarrier compensation and universal service regimes. In their meeting with Ms. Shaffer, NECA, NTCA and OPASTCO also discussed various universal service scenarios and hypothetical situations and how they could impact plans to reform contribution and distribution methodology and these associations maintained positions consistent with prior filings in CC Docket No. 96-45.

Finally, the Associations request the Commission incorporate this letter and the attached document in the record of the Jurisdictional Separations Reform and the Jurisdictional Separations Freeze proceeding, CC Docket No. 80-286.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe A. Douglas".

On Behalf of:

National Exchange Carrier Association, Inc.
Eastern Rural Telephone Association
Independent Telephone & Telecommunications Alliance
National Telecommunications Cooperative Association
Organization for the Protection and Advancement of Small Telecommunications Companies
Western Telecommunications Alliance